

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

SHIRLEY RADABUAGH

Plaintiff,

v.

CLAY TURNER REALTY GROUP

Defendant.

1:20-cv-00058-JRH-BKE

**DECLARATION OF
DORSEY R. CARSON, JR.**

AFFIDAVIT

STATE OF MISSISSIPPI

COUNTY OF HINDS

I, DORSEY R. CARSON, JR., do hereby swear under the penalty of perjury that the following is true and correct to the best of my personal knowledge:

1. I am counsel for plaintiff Shirley Radabaugh ("Plaintiff") in this action, and I respectfully submit this Declaration in further support of Plaintiff's application for an award of attorneys' fees against Defendant Clay Turner Realty Group, LLC ("Defendant"), pursuant to 17 U.S.C. § 505, Fed. R. Civ. P. 54(d), and Local Civ. R. 54.2 [Doc. No. 41].

2. I am an attorney currently licensed in good standing to practice law. I am a member of the state bars of Georgia, Mississippi, Arkansas, Texas, and Washington, D.C. I have been an active trial attorney for twenty-five (25) years. I

am the sole equity shareholding partner in the law firm of Carson Law Group, PLLC (“CLG”).

3. As legal counsel for Plaintiff, I am familiar with and have personal knowledge of CLG’s attorneys’ fees and other expenses incurred in connection with this action. I have personally rendered legal services to Plaintiff in this case, and I have been actively involved in all stages of this case.

4. Beginning in June 2020, I served as lead counsel in this matter for Plaintiff. Our firm has also had associates and paralegals working on this matter.

5. My current standard rate is \$320.00 per hour. In my experience and opinion, this \$320.00 hourly rate is at or below the rate for similarly experienced and situated lawyers in Georgia.

6. Plaintiff incurred hourly charges for my services and the services of other attorneys and paralegals at CLG.

7. The CLG has spent over 37.7 hours on this case, for a total of \$8,495.80 (\$8,274.00 in attorneys’ fees and \$221.30 in costs), all of which Plaintiff seeks to recover in her motion.

8. I spent at least 9.8 hours working on this instant action for a total of \$3,136.00. This amount of time and effort is reasonable given the nature and complexity of the issues presented, and the litigation overall.

9. Kelli Slater spent a total of at least 8.9 hours working on this matter, for a total of \$1,913.50. This hourly rate of \$215.00 is at or below similarly experienced and situated lawyers. After graduating from Howard University in 2017, Ms. Slater attended Tulane University Law School and graduated from Tulane University Law School in 2020, where she was President of the International Law Society and a member of the Tulane Journal of International and Comparative Law. This amount of time and effort is reasonable given the nature and complexity of the issues presented, and the litigation overall.

10. Lindsay Roberts spent a total of 0.3 hours working on this matter, for a total of \$69.00. This hourly rate of \$230.00 is at or below similarly experienced and situated lawyers. After graduating from the University of Mississippi in 2014, Mrs. Roberts attended Mississippi College Law School and graduated from Mississippi College Law School in 2018, where she was a member of the Moot Court Board and Technical Articles Editor of the Law Review. This amount of time and effort is reasonable given the nature and complexity of the issues presented, and the litigation overall.

11. Kathryn Goff spent a total of 0.3 hours working on this matter, for a total of \$67.50. This hourly rate of \$225.00 is at or below similarly experienced and situated lawyers. After graduating from the University for Arkansas in 2015, Mrs. Goff attended Mississippi College Law School and graduated from Mississippi

College Law School in 2018, where she was a member of the Moot Court Board and the Law Review. This amount of time and effort is reasonable given the nature and complexity of the issues presented, and the litigation overall.

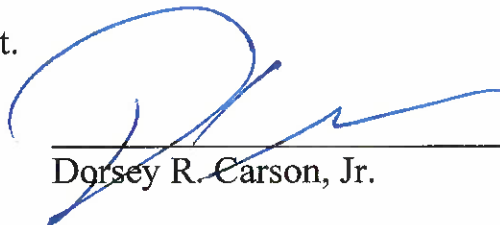
12. Our firm's research specialist Chuck Granger's time and efforts in this matter were also reasonable. Mr. Granger spent 0.7 hours working on this matter at his rate of \$240.00 an hour, for a total of \$168.00. This rate is at or below similarly experienced and situated research specialists. Mr. Granger graduated from Mississippi State University in 2008, and the University of Virginia School of Law in 2011. This amount of time and effort is reasonable given the nature and complexity of the issues presented, and the litigation overall.

13. Our firm's paralegals' time and efforts in this matter were also reasonable. Shannon McMullan spent 6.0 hours working on this matter at her standard rate of \$165.00 an hour, for a total of \$990.00. Aisha McKnight spent 11.7 hours working on this matter at her standard rate of \$165.00 an hour, for a total of \$1,749.00.

14. Attached as Exhibit A are true and correct copies of contemporaneous invoices detailing the amount of fees and costs.

[THIS WAS INTENTIONALLY LEFT BLANK.]

And further, Affiant saith not.



Dorsey R. Carson, Jr.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 10th day of September 2021.



Notary Public

My Commission Expires:

